



December 5, 2023

BY ECF

Honorable Robert W. Lehrburger
 United States Magistrate Judge
 Southern District of New York
 500 Pearl Street, Suite 1960
 New York, NY 10007

The sealing request is granted.

SO ORDERED:

12/6/2023

HON. ROBERT W. LEHRBURGER
 UNITED STATES MAGISTRATE JUDGE

Re: Letter Motion to Seal Material in ECF Nos. 366, 368, 370
***Bulgari v. Bulgari*, No. 1:22-cv-05072-LGS-RWL**

Dear Judge Lehrburger:

On behalf of Plaintiff Ilaria Bulgari, we respectfully submit this letter motion to maintain certain material in Plaintiff's Opposition to Defendant's Motion for Summary Judgment under seal. In accordance with Your Honor's Rules for Redactions and Filing Under Seal, the parties conferred and agreed that only the following categories of information should remain under seal:

1. Bank account numbers (other than the last three digits or letters);
2. Personal addresses (redacting only the street number and apartment number);
3. Personal or direct email addresses and telephone numbers;
4. Tax information, including tax ID numbers and social security numbers; and
5. Information the parties agreed to maintain under seal in Defendant's filing, including:
 - a. Information related to Anna Bulgari's medical condition or diagnoses; and
 - b. References to where Defendant's children go to school.

The limited categories set forth above are consistent with Section 21 of the Local ECF Filing Rules and Instructions, this Court's sealing order concerning Defendant's summary judgment motion papers (ECF No. 343), and the Second Circuit's standards as articulated in *Lugosch v. Pyramid Co. of Onondaga*, 453 F.3d 110 (2d Cir. 2006). For the Court's convenience, we are submitting via email highlighted versions of ECF Nos. 366, 368, and 370 identifying all of Plaintiff's proposed redactions.

Respectfully Submitted,

/s/ David Boies

David Boies

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cc (via ECF): All counsel of record